

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

In the Matter of the Denial of Federal)
Firearms Application/Renewal, FFL No.) Case No.: 1:25-cv-245
1-56-03195, Pursuant to Chapter 44, Title)
18, United States Code, As a Dealer in)
Firearms Other Than Destructive Devices)
) PETITION
Licensee:) FOR DE NOVO JUDICIAL REVIEW
Blackwood Station Outfitters, Inc.)
5670 N US 15-501)
Pittsboro, North Carolina 27312)
)

NOW COMES Blackwood Station Outfitters, Inc., Petitioner, by and through the undersigned counsel, who hereby requests that this Court grant a de novo review hearing of the denial of federal firearms application/renewal, 1-56-03195 (“FFL”), pursuant to 18 U.S.C. § 923(f)(3), and in support thereof, Petitioner shows unto the Court as follows:

1. Petitioner is a North Carolina Corporation with its principal place of business and registered mailing address at 5670 US 15-501 North, Pittsboro, Chatham County, North Carolina 27312.
2. Petitioner operates a sporting goods store located at 5670 US 15-501 North, Pittsboro, Chatham County, North Carolina 27312.
3. Petitioner holds federal firearms license number 1-56-03195 (“FFL”) as a dealer in firearms other than destructive devices.
4. Petitioner’s FFL was due to expire on 1 October 2024.
5. On 31 July 2024, Petitioner submitted a timely renewal application for its FFL.

6. On 15 August 2024, the Bureau of Alcohol, Tobacco, Firearms, and Explosives (“ATF”) issued a Notice to Deny Application for FFL, ATF Form 5300.43 and Petitioner timely requested a hearing to review the Notice to Deny Application.

7. On 6 November 2024, a hearing was held at the ATF Raleigh Field Division Office.

8. On or about 27 January 2025, the ATF denied Petitioner’s Application to Renew its FFL pursuant to 18 U.S.C. § 923(d) and 27 C.F.R. § 478.71. (Exhibit 1)

9. On or about 27 January 2025, Regina Milledge-Brown, Director of Industry Operations, sent the Final Notice of Denial of Application, Revocation Suspension and/or Fine of Firearms License and its Findings of Fact and Conclusions of Law (“Notice”) via USPS Certified Mail, tracking number 9589071052702396651924.

10. On or about 18 February 2025, Notice was delivered to Petitioner, effecting service of the Notice.

11. Pursuant to 18 U.S.C. § 923(f)(3), Petitioner may petition the United States District Court for the district in which it has its principal place of business for a de novo judicial review of the revocation of its FFL.

12. Further, pursuant to 18 U.S.C. § 923(f)(3), the District Court may consider any evidence submitted at the de novo review regardless of whether such evidence was considered at the agency hearing.

WHEREFORE, Petitioner respectfully requests that the United States District Court for the Middle District of North Carolina allow Petitioner to exercise his rights under 18 U.S.C. Chapter 44 and to hold a de novo judicial review the revocation of its FFL at a time convenient to all parties and the Court.

This the 28 of March 2025.

Landon White Law Firm, PLLC

/s/ D. Landon White
D. Landon White
N.C. Bar. No. 45120
887 Washington Street, Ste A
Raleigh, NC 27605
PO Box 6696
Raleigh, NC 27628
Email: lwhite@landonwhitelaw.com
Telephone: 919-745-8060
Facsimile: 919-750-0068
Attorney for Petitioner

CERTIFICATE OF SERVICE

I hereby certify that on this day I electronically filed the foregoing Petition for De Novo Judicial Review with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

United States Attorney's Office – Middle
District of North Carolina
101 South Edgeworth Street, 4th Floor
Greensboro, NC 27401
Telephone: 336-333-5351
E: USANCM.Webmaster@usdoj.gov
Attorney for Respondent

Regina Milledge-Brown
Director of Industry Operations
Bureau of Alcohol, Tobacco, Firearms
and Explosives
3600 Arco Corporate Drive, Suite 500
Charlotte, NC 28273
E: cathy.hunter@atf.gov
Respondent

Ms. Pamela Bondi
United States Department of Justice
950 Pennsylvania Avenue NW
Washington, D.C. 20530

Civil Process Clerk
United States Attorney's Office for the
Middle District of North Carolina
101 South Edgeworth Street, 4th Floor
Greensboro, NC 27401

This the 28 of March 2025.

Landon White Law Firm, PLLC

/s/ D. Landon White
D. Landon White
N.C. Bar. No. 45120
887 Washington Street, Ste A
Raleigh, NC 27605
PO Box 6696
Raleigh, NC 27628
Email: lwhite@landonwhitelaw.com
Telephone: 919-745-8060
Facsimile: 919-750-0068
Attorney for Petitioner